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Attorneys for Defendant
TESLA, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DONNA LEACH, individually and on
behalf of the Estate of Clyde Leach,

Plaintiff,

vs.

TESLA, INC. and DOES 1 through 100,
inclusive,

Defendants.

Case No. 3:23-cv-03378-SI
(Removed from Santa Clara County Superior
Court – Case No. 23CV414572)

District Judge: Hon. Susan Illston
Magistrate Judge: Hon. Sallie Kim

JOINT NOTICE OF SETTLEMENT

Action Filed: April 11, 2023
Trial Date: April 13, 2026

JOINT NOTICE OF SETTLEMENT

Plaintiff Donna Leach and Defendant Tesla, Inc. have reached a settlement of all claims in this matter. Accordingly, the Parties request that the Court vacate all current deadlines. A notice of dismissal will be forthcoming.

1 Dated: April 21, 2025

Respectfully submitted,

2 **NELSON MULLINS RILEY & SCARBOROUGH**
3 **LLP**

4 By: /s/ Trevor C. Zeiler
5 Sandra G. Ezell
6 Eden M. Darrell
7 Trevor C. Zeiler
8 Dennis A. Hom (Pro Hac Vice)
9 Attorneys for Defendant
10 TESLA, INC.

11 April 21, 2025

Respectfully submitted,

12 **MCCUNE LAW GROUP, APC**

13 By: /s/ Todd A. Walburg
14 Todd A. Walburg
15 Scott B. Baez
16 Attorneys for Plaintiff
17 DONNA LEACH
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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2025, I filed the foregoing document entitled **JOINT NOTICE OF SETTLEMENT** with the clerk of court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record in this action.

/s/

NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AT LAW
LOS ANGELES

PROOF OF SERVICE
F.R.C.P. Rule 5(b)(2)(3)

I, the undersigned, am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; am employed with Nelson Mullins Riley & Scarborough LLP and my business address is 19191 South Vermont Avenue, Suite 900, Torrance, CA 90502.

On April 21, 2025 I served the foregoing document entitled **JOINT NOTICE OF SETTLEMENT** on all the appearing and/or interested parties in this action by placing ☐ *the original* ☐ *a true copy* thereof as follows:

☐ **[by MAIL]** - I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing this affidavit.

☐ **[by FAX]** - I caused the aforementioned document(s) to be telefaxed to the aforementioned facsimile number(s). The machine printed a record of the transmission, and no error was reported by the machine.

☐ **[by FEDERAL EXPRESS]** - I am readily familiar with the firm's practice for collection and processing of correspondence for overnight delivery by Federal Express. Under that practice such correspondence will be deposited at a facility or pick-up box regularly maintained by Federal Express for receipt on the same day in the ordinary course of business with delivery fees paid or provided for in accordance with ordinary business practices.

☐ **[by ELECTRONIC SUBMISSION]** - By transmitting such document(s) electronically from my e-mail address at Nelson Mullins Riley & Scarborough LLP to the person(s) at the electronic mail addresses listed above pursuant to Emergency Rule 12 and/or the agreement of the parties.

☐ **[by ELECTRONIC SUBMISSION]** - I served the above listed document(s) described via the United States District Court's Electronic Filing Program on the designated recipients via electronic transmission through the CM/ECF system on the Court's website. The Court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document(s). Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities.

☐ **[by PERSONAL SERVICE]** - I caused to be delivered by messenger such envelope(s) by hand to the office of the addressee(s). Such messenger is over the age of eighteen years and not a party to the within action and employed with [attorney service].

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed April 21, 2025 at Torrance, California.

Print Name By: _____
Signature

SERVICE/MAILING LIST

Donna Leach, et al. v. Tesla, Inc., et al.
Santa Clara Superior Court Case No.: 23CV414572

MCCUNE LAW GROUP, APC Todd A. Walburg, Esq. Scott B. Baez, Esq. David C. Wright, Esq. 3281 East Guasti Road, Suite 100 Ontario, CA 91761	ATTORNEYS FOR PLAINTIFF Tel: 909/ 757-1250 Fax: 909/ 757-1275 Email: taw@mccunelawgroup.com sbb@mccunelawgroup.com dcw@mccunelawgroup.com
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